

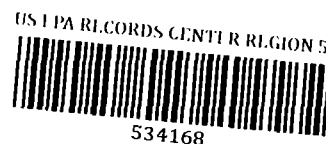
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: JAN 10 1985

SUBJECT 1984 Third Quarter Tracking Report
Diamond Shamrock Administrative Consent Order

FROM: Gene Wong, OSC *Gene Wong*
Remedial Response Section I

TO: See Addressees Below



Diamond Shamrock was in compliance with all terms and requirements of the Subject Consent Order for the third quarter of 1984. The following items will provide a brief discussion regarding topics involved in the Subject Consent Order.

1. On September 18, 1984, I accompanied Diamond Shamrock personnel on the third quarter site inspection. Previous site inspection reports had indicated recurring problem areas at the site. After the site inspection, I noted that the problem areas were not significant and should not adversely affect the integrity of the cap. At present, remedial actions are unnecessary, however, the problem areas should be monitored carefully for deterioration.
2. The site access problem still exists. Due to the remoteness and seclusion of the west gate, trespassers continue to vandalize the gate. Diamond Shamrock is considering relocating the entrance gate to a more visible location to deter future trespassing.
3. With the completion of one year of data, the groundwater monitoring wells will be sampled on a quarterly basis rather than a monthly basis.
4. All recordkeeping and reporting requirements as specified in Section V, Articles 1 and 2 of the Administrative Consent Order were met this quarter.
5. Dr. Richard Lutton who provides technical support services to this project has written a paper which indirectly and anonymously references the Diamond Shamrock site. Both the Office of Regional Counsel and I have reviewed a draft of Dr. Lutton's paper "Media Verification in Waste Facility Development" and have concluded that no problems should arise with respect to this paper.

Attachment
Addresses
Constantelos
Bartelt
Schaefer
Liszewski
Neuberger

DIAMOND SHAMROCK CHEMICAL COMPANY
CONSENT ORDER TRACKING REPORT

- ROUTINE EVENTS -

SECTION OR APPENDIX	EVENT	DATES SPECIFIED/ACCOMPLISHED	COMMENTS
I.	GROUNDWATER MONITORING PROGRAM		
I. 4	After well installation is completed a survey shall be conducted to establish well-head elevations with respect to a fixed point, preferably mean sea level. The wells shall be so surveyed every two years for the first six (6) years.		See 1983 third quarter report.
I. 5	The monitoring wells, except existing upgradient wells presently identified as #6 and #7, shall be measured for groundwater elevations monthly for two years after which time they shall be measured quarterly for the next eight years and semiannually for the remainder of the Groundwater Monitoring Program.	7-84/7-84 8-84/8-84 9-84/9-84	Elevations presented in 1984 third quarter report submitted 10-08-84.
I. 5	Groundwater elevations shall be measured annually in upgradient wells #6 and #7.	9-84/9-84	Elevations presented in 1984 third quarter report submitted in 10/08/84.
I. 6	All wells, except wells #6 and #7, shall be sampled monthly for the first year, quarterly for the next nine years, and semiannually for the remainder of the 30-year Groundwater Monitoring Program, unless otherwise provided pursuant to Section X.7.	7-84/7-84 9-84/9-84	First year of sampling was completed in July 1984. Groundwater monitoring wells are sampled on a quarterly basis now.

DIAMOND SHAMROCK CHEMICAL COMPANY
CONSENT ORDER TRACKING REPORT

- ROUTINE EVENTS -

SECTION OR APPENDIX	EVENT	DATES SPECIFIED/ACCOMPLISHED	COMMENTS
I. 6	Groundwater sampling shall be performed annually for wells #6 and #7 for the entire Groundwater Monitoring Program.	9-84/9-84	Sample results presented in 1984 third quarter report submitted 10/08/84.
I. 9	Water levels shall be recorded monthly in the interior wells for a period of two years and quarterly for the next eight years and semiannually for the remainder of the Groundwater Monitoring Program.	7-84/7-84 8-84/8-84 9-84/9-84	Water levels presented in 1984 third quarter report submitted 10/08/84.
II.	SITE INSPECTION AND MAINTENANCE PROGRAM		
II. 4	Diamond shall take or cause to be taken oblique aerial color photographs of the Site at the commencement of the Site Inspection and Maintenance Program, and every five years thereafter.		See 1983 third quarter report.
II. 5	Visual Site inspections shall be conducted quarterly for an initial ten-year period and semiannually for the succeeding twenty-year period.	Quarterly-9/13/84	For detailed comments regarding 9/13/84 site inspection, refer to trip report dated 10/24/84.
App. D	An annual bank stability survey will be conducted to determine vertical and horizontal movement of 3 riverbank markers.		See 1984 second quarter report.

DATE: 1984 QUARTER: 3rd

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DIAMOND SHAMROCK CHEMICAL COMPANY
CONSENT ORDER TRACKING REPORT

- ROUTINE EVENTS -

SECTION OR APPENDIX	EVENT	DATES SPECIFIED/ACCOMPLISHED	COMMENTS
III.	GRAND RIVER MONITORING PROGRAM		
III. 4	Sampling at the river sampling locations shall be performed monthly for the first ten-year period and quarterly for the succeeding 20-year period, subject to such changes in frequency as may be required by weather conditions or otherwise as provided in Section X.7.	7-84/7-84 8-84/8-84 9-84/9-84	Sample results presented in 1984 third quarter report submitted 10/08/84.
V.	RECORDKEEPING AND REPORTING		
V. 1	Diamond shall provide U.S. EPA and Ohio EPA, within 30 days following the close of each quarter, copies of all Grand River Monitoring Log Sheets, Groundwater Log Sheets, and Site Inspection Log Sheets for that quarter.	10-84/10-84	Submitted under 10/08/84 memo.
V. 2	Diamond shall provide to U.S. EPA and Ohio EPA at least ten (10) days notice of any routine sampling or inspection.		All notices submitted on time for 1984 third quarter.